

**From:** Barbara Ritchie <BARBARA.RITCHIE@fmc.com>  
**Sent:** Tuesday, June 03, 2014 7:46 AM  
**To:** Rochlin, Kevin  
**Cc:** Douglas.Tanner@deq.idaho.gov; Scott.Miller@deq.idaho.gov; 'Kelly Wright'; susanh@ida.net  
**Subject:** FMC final soil remedy design and RAWP site-wide grading phase  
**Attachments:** 2014-06-02 FMC transmittal final Soil Remedy Design and RAWP.pdf

Confirming packages as described in attached transmittal letter were fed ex'd to y'all yesterday and you should be receiving today.

Note that in the assembly of the packages, we may not have added an electronic copy of the transmittal letter to the CD – attached here for your records.

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# FMC Corporation

*Transmitted Via Federal Express*

June 2, 2014

Kevin Rochlin  
Project Coordinator  
U. S. Environmental Protection Agency  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101

Re: FMC Corporation Pocatello, ID  
Unilateral Administrative Order for Remedial Design and Remedial Action  
EPA Docket No. CERCLA 10-2013-0116  
Soil Remedial Action Engineering Design and Removal Action Work Plan  
Site-Wide Grading Phase

Dear Mr. Rochlin,

The purpose of this letter is to transmit the Soil Remedial Action Engineering Design and Removal Action Work Plan for Site-Wide Grading Phase to EPA. This submittal has been prepared for purposes of the remedial design and remedial action (RD/RA) FMC is conducting at the FMC OU as directed under the Unilateral Administrative Order (UAO) that the U.S. Environmental Protection Agency (EPA) issued to FMC effective June 20, 2013.

Enclosed are:

1. FMC's responses to the May 2, 2014 EPA and IDEQ comments and April 18, 2014 Shoshone-Bannock Tribes comments on FMC's March 3, 2014 submittal of remedial design documents and other supporting plans. FMC's response to comments is Appendix F of the Remedial Design Report (RDR).
2. Appendix A to the RDR - The Remedial Design drawings for the Site-wide Grading Phase (100%) and for the Capping Phase (still at 30% design), revised to address comments on the March 3, 2014 draft. These are provided in hard copy and have been reorganized to more clearly delineate those drawings which pertain to Site-Wide Grading Phase versus those which do not.
3. A draft Removal Action Work Plan (RAWP) - You will note that there are place holders for seven (7) of the ten (10) appendices, e.g., for the plans to be prepared by the selected Remedial Action contractor who will implement the Site-Wide Grading construction work. The Dust Control and Air Monitoring Plan (Appendix C) is included in the draft RAWP in response to EPA's comments. The Performance Standards Verification Plan for RA-J and Cleaning Stormwater Piping at RA-A (Appendix H) is included in this draft RAWP. A Cap Delineation Data Gap Work Plan (Appendix I) is included in this draft RAWP in response to EPA's comments.



4. A Compact Disk (CD) containing the entire Remedial Design Submittal, Supporting Documents and draft Remedial Action Work Plan. In addition to the documents described above, the documents on the CD include:
- The Remedial Design Report (RDR) revised to address EPA, IDEQ and SBT comments per FMC's response to comments and to update the schedule. The changed sections are shown in highlight to facilitate review.
  - Appendix B to the RDR (Calculations) and Appendix E (Stormwater Management Design Report) did not required revision pursuant to the comments, and thus are included as from the March 3, 2014 submittal.
  - Appendix C to the RDR (Specifications) has been revised in two regards. First, two new specifications have been included (01900 – Equipment Decontamination and 02930 – Seeding) to address comments received. Second, three specifications were revised to clarify content based on comments from bidders. The indices for the specifications show with highlighting which have been revised; changes within the specification are not highlighted.
  - Appendix D to the RDR (Construction Quality Assurance/Quality Control Plan) did not required revision pursuant to the comments, and thus is included as from the March 3, 2014 submittal.
  - The Emergency Response Plan, submitted in draft form on March 3, 2014, has been revised as described in FMC's response to comments. A copy is included on the enclosed CD, with changed sections shown in highlight to facilitate review. This document is in the "Supporting Documents" file on the CD.
  - The Transportation and Off-site Disposal Plan, submitted in draft form on March 3, 2014, has been revised as described in FMC's response to comments. A copy is included on the enclosed CD, with changed sections shown in highlight to facilitate review. This document is in the "Supporting Documents" file on the CD.

Please note that the Site-wide Grading Phase of the soil remedial action includes only grading for storm water control, installation of capillary barrier portion of ET caps, storm water piping cleanout and soil excavation at RA-J. As noted in FMC's response to comments (item 1 above), FMC will fully resolve comments pertaining to work beyond the scope of the Site-Wide Grading Phase (i.e., capping phase), and revise plans relevant to the capping phase scope with the submittal of the pre-final (90%) soil design package (e.g., cap designs) targeted for December 2014.

With timely EPA review of these submittals, FMC should be able to commence site grading during the 2014 construction season. The schedule included in the Remedial Design Report is repeated below.

<b>RD Deliverable / Work Element</b>	<b>Date</b>
Submit Soil Remedy - Design Package; Site-Wide Grading and Stormwater Design and Plans submitted at the Pre-final (90%) RD level	<b>March 3, 2014</b>
EPA Comments on RD Package and Site-Wide Grading and Stormwater Design and Plans at the Pre-final (90%) RD level	<b>May 2, 2014</b>
Submit Final (100%) RD Package and Draft Remedial Action Work Plan for Site-Wide Grading phase	<b>June 2, 2014</b>
EPA approval of Site-Wide Grading phase Design, Plans, Specifications and Supporting Documents, and EPA Comments on Draft Remedial Action Work Plan for Site-Wide Grading phase	June 30, 2014
Submit Final Remedial Action Work Plan for Site-Wide Grading phase with Contractor prepared plans	July 7, 2014
Distribute final ERP to response agencies and schedule meeting(s)	July 14, 2014
EPA approval of Final Remedial Action Work Plan for Site-Wide Grading phase	August 8, 2014
Pre-Construction Inspection and Meeting	August 12, 2014
Start of Site-Wide Grading Construction	August 18, 2014
Completion of Site-Wide Grading Construction (approx. 14 month duration)	November 20, 2015

If you have any questions, or require additional information, please contact me at 215/299-6700.

Sincerely,



Barbara E. Ritchie  
Associate Director, EHS

Enclosure (3 copies as per EPA direction)

cc (as required under the UAO):

Doug Tanner, Idaho Department of Environmental Quality (1 copy)

Scott Miller, Idaho Department of Environmental Quality (1 copy)

Kelly Wright, Shoshone-Bannock Tribes (1 copy)

Susan Hanson, Shoshone-Bannock Tribes (1 copy)